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JONATHAN KOHN-3014

IN RE:)	UNITED STATES BANKRUPTCY COURT
)	DISTRICT OF NEW JERSEY
NICHOLAS JOHN ALTIERI,)	CASE NO. 11-12819-DHS
)	CHAPTER 7
)	NOTICE OF MOTION TO DISMISS
DEBTOR(S))	

TO: Via E-Mail:
United States Trustee
U.S. Department of Justice
District of New Jersey
One Newark Center
Suite 2100
Newark, NJ 07102

Via Regular Mail:
Nicholas John Altieri
22 Ryerson Road
Lincoln Park, NJ 07035
Debtor

PLEASE TAKE NOTICE that Jonathan Kohn, Chapter 7 Trustee, will move before The Honorable Donald H. Steckroth on April 26, 2011 at 10:00 A.M. at the United States Bankruptcy Court, 50 Walnut Street, Newark, New Jersey 07102 for an Order to dismiss this case pursuant to 11 U.S.C. Sections 521 and 707.

PLEASE TAKE FURTHER NOTICE that in support of this motion, the moving party shall rely upon the annexed Declaration of Jonathan Kohn.

PLEASE TAKE FURTHER NOTICE that the issues raised in this motion are not so complex or novel as to require a brief. The moving party relies on clear statutory language as the basis for relief.

PLEASE TAKE FURTHER NOTICE that the movant waives oral argument unless timely responsive papers are filed or this Court otherwise directs.

A proposed form of Order is submitted herewith.

ROTHBARD, ROTHBARD, KOHN & KELLAR
Attorneys for Trustee

By: _____
JONATHAN KOHN

DATED: 4/1/11